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*Attorneys for Defendants Samsung Electronics  
America, Inc., and Samsung Electronics Co., Ltd.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SHIRLEY CRAWFORD, MATTHEW  
JORDAN, MELISSA ALEJANDRO,  
NICOLA SOBERS, JANICE BUTLER,  
PAULINE DION, LISA SAGHY, and  
RICHARD ANGEMI, individually and on  
behalf of all those similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC., and SAMSUNG ELECTRONICS  
CO., LTD.,

Defendants.

Civil Action No. 2:22-cv-02828  
(MCA)(AME)

**NOTICE OF DEFENDANTS'  
MOTION TO DISMISS  
PLAINTIFFS' FIRST  
AMENDED COMPLAINT**

**ORAL ARGUMENT  
REQUESTED**

*Electronically Filed*

**PLEASE TAKE NOTICE** that Defendants Samsung Electronics America, Inc. ("SEA") and Samsung Electronics Co., Ltd. ("SEC") shall move before the

Honorable Madeline Cox Arleo, U.S.D.J., at the United States District Court for the District of New Jersey, Newark, New Jersey, on March 6, 2023, at 9:00 a.m. or at such other date and time as set by the Court, for an Order dismissing Plaintiffs' First Amended Complaint in its entirety and with prejudice.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, SEA and SEC will rely upon the Brief, Certification of James L. Ryerson, Esq. with exhibits, and Proposed Order submitted herewith. This motion is submitted pursuant to the Consent Orders of the Court dated October 20, 2022 (Dkt. 9) and December 6, 2022 (Dkt. 16).

**PLEASE TAKE FURTHER NOTICE** that, pursuant to L. Civ. R. 78.1(b), SEA and SEC request oral argument on this motion.

Respectfully submitted,

Dated: December 16, 2022

By: /s/ James L. Ryerson  
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